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17 UNITED STATES BANKRUPTCY COURT

18 CENTRAL DISTRICT OF CALIFORNIA

19 NORTHERN DIVISION

20 In re:) Case No.: 9:19-BK-11573-MB
21 HVI CAT CANYON, INC.,) Chapter 11
22 Debtor.) **DECLARATION OF ALICIA CLOUGH IN SUPPORT**
23) **OF RESPONSE TO REPLY OF THE OFFICIAL**
24) **COMMITTEE OF UNSECURED CREDITORS TO:**
25) **(1) CALIFORNIA STATE LAND COMMISSION'S**
26) **LIMITED OBJECTION TO APPLICATION FOR**
27) **ORDER AUTHORIZING AND APPROVING THE**
28) **EMPLOYMENT OF PACHULSKI STANG ZIEHL &**
) **JONES LLP AS COUNSEL FOR THE OFFICIAL**
) **COMMITTEE OF UNSECURED CREDITORS,**
) **EFFECTIVE AS OF AUGUST 16, 2019 [Docket No.**
) **346]; and**

1) **(2) CALIFORNIA STATE LAND COMMISSION'S**
2) **LIMITED OBJECTION TO APPLICATION OF THE**
3) **OFFICIAL COMMITTEE OF UNSECURED**
4) **CREDITORS FOR AUTHORIZATION TO RETAIN**
5) **AND EMPLOY CONWAY MACKENZIE, INC. AS**
6) **FINANCIAL ADVISOR, EFFECTIVE AS OF**
7) **AUGUST 16, 2019 [Docket No. 347]**

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Hearing Date: October 28, 2019
Hearing Time: 10:00 a.m.
Place: Courtroom 201
1415 State Street, Courtroom 202
Santa Barbara, CA 93101
Judge: The Honorable Martin R. Barash

DECLARATION OF ALICIA CLOUGH

I, Alicia Clough, declare as follows:

1. I am an attorney licensed to practice law in the State of California, and Senior Counsel at the law firm of Loeb & Loeb, counsel for the California State Lands Commission (hereinafter, the "Commission") in the above-referenced matter. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. Capitalized terms not defined herein shall have the same meaning as ascribed to them in the motion filed concurrently with this declaration.

2. Attached as **Exhibit A** is a true and correct copy of the August 29, 2019 Expert Report of Monty Kehl filed in this case on August 30, 2019.

3. Attached as **Exhibit B** is a true and correct copy of the Statement of Position of Official Committee of Unsecured Creditors in Support of Motion to Transfer Venue) filed on August 23, 2019 [Docket No. 74 at 1-2].

4. Attached as **Exhibit C** is a true and correct copy of excerpts from the hearing held on August 27, 2019, in this case in the Southern District of New York Bankruptcy Court.

5. Attached as **Exhibit D** is a true and correct copy of excerpts from the hearing held in this case on September 23, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of October 2019, at Los Angeles, California.



Alicia Clough